

REMARKS

Claims 1-12 and 14-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,170,455 ("Goossen") in view of U.S. Patent 5,711,890 ("Hawkins"). Applicants respectfully disagree with the rejection.

Neither Goossen nor Hawkins provides the teaching or suggestion that would lead a person of ordinary skill in the art to the claimed invention. Goossen describes optical connection devices which include an array of pillars supported on a support member. Goossen, col. 2, lines 49-52. The pillars are formed by micromachining "using either a laser, ion milling, chemical etching, injection molding or the like." Col. 3, lines 4-6. As noted by the Office, Goossen fails to disclose micromachining by chemical mechanical polishing (CMP).

The Office places emphasis on the phrase "and the like" in the above quotation (see Office Action, page 3, where the phrase is in bolded text). It is respectfully submitted, however, that "and the like" cannot reasonably be considered as encompassing or suggesting CMP. In fact, the opposite is true. "And the like" suggests that other conventional micromachining techniques may be used. Prior to the instant invention, CMP was not used for micromachining.

Hawkins, which describes a method for forming cylindrical lens arrays for solid state imagers, is cited by the Office as

showing that it is known to have utilized chemical mechanical polishing to selectively remove material from the surface of the workpiece. However, Hawkins only teaches the use of chemical mechanical polishing in the conventional way, i.e., for surface planarization. For example, at col. 6, lines 8-10, Hawkins states that the surface of the structure in Fig. 4E is "planarized optically flat, preferably by chemical mechanical polishing." Examination of Fig. 4E reveals that the surface is indeed flat, and no surface features are apparent.

Hawkins does not teach or suggest using CMP for micromachining or for forming non-planar surface features. Thus, even if Hawkins and Goossen were combinable, a person of ordinary skill would not use Hawkins' CMP as Goossen's micromachining technique: there is nothing in either reference that suggests this modification should be made.

For at least the foregoing reasons, it is respectfully submitted that the claims are not obvious over Goossen and Hawkins. Withdrawal of the § 103 rejection is therefore respectfully requested.

Should the Examiner believe a discussion of this matter would be helpful, the Examiner is invited to telephone the undersigned at (312) 913-0001.

Respectfully submitted,

**McDonnell Boehnen  
Hulbert & Berghoff LLP**

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By: Raafat Shaltout  
Raafat Shaltout  
Reg. No. 45,092

**McDonnell Boehnen  
Hulbert & Berghoff LLP**  
300 South Wacker Drive  
Chicago, Illinois 60606  
Telephone: (312) 913-0001